



U.S. Department of Justice

United States Attorney  
Southern District of New York

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86 Chambers Street  
New York, New York 10007

October 5, 2021

By ECF:

The Honorable Paul A. Crotty  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *First Look Institute, Inc. and W. Paul Smith v. U.S. Dep't of State*,  
No. 21 Civ. 6197 (PAC)

Dear Judge Crotty:

As proposed by the parties and required by the Court at the September 29 initial conference, we write on behalf of both sides in this FOIA case to provide an update and propose a processing schedule.

**Status update and proposal for further update.** Since the conference, the parties have continued to confer by email and telephone about State's searches and processing rate. The parties are continuing to discuss several issues as to which no party seeks relief at this time, including the adequacy of State's searches, and potentially responsive records that are in Arabic. The parties propose to provide a further status update in one approximately month, or by Friday, November 5.

**Scheduling proposal.** The parties have also continued to discuss State's processing schedule. The parties have reached agreement on the following schedule:

- By November 16, 2021, State will process at least 525 pages of potentially responsive records and produce all non-exempt responsive records and portions of records it has processed.
- By December 28, 2021, State will process an additional 525 pages of potentially responsive records and produce all non-exempt responsive records and portions of records it has processed.
- The parties will confer to discuss a further schedule for processing any potentially responsive records that remain after the November 16, 2021 and December 28, 2021 productions, including, if necessary, the Arabic-language records. The parties will also confer about any disputed exemptions. The parties will provide the Court with a further status update by January 14, 2022.

We thank the Court for its attention to this matter.

Respectfully,

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By: /s/ Debra Greenberger

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